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16 Attorneys for Defendant ZF TRW Automotive Holdings Corp.

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19 M.S., a minor individual, by Guardian

20 VALERIE SANDERS,

21 Plaintiffs,

22 Vs.

23 HYUNDAI MOTOR AMERICA, a California
24 business entity; HYUNDAI MOTOR

25 COMPANY, a Korean corporation; TAKATA

26 CORPORATION a Japanese corporation; ZF

27 TRW AUTOMOTIVE HOLDINGS CORP., a

28 Delaware Corporation; ZF

FRIEDRICHSHAFEN AG, a German

Corporation; ROE AIRBAG

MANUFACTURING COMPANY; DOE

INDIVIDUALS I through XXX and ROE

CORPORATIONS XXXI through LX,

Defendants.

Case Number:

2:20-cv-01861-GMN-BNW

**STIPULATION AND ORDER OF
DISMISSAL FOR ZF TRW
AUTOMOTIVE HOLDINGS
CORP.**

1 Plaintiff M.S., a minor individual, by Guardian VALERIE SANDERS (“Plaintiff”),
2 by and through her counsel KEMP JONES LLP and Defendant ZF TRW AUTOMOTIVE
3 HOLDINGS CORP. (“ZF TRW AH”), by and through its counsel of record, WEINSTEIN
4 TIPPETTS & LITTLE LLP and OLSON, CANNON, GORMLEY & STOBERSKI, hereby
5 stipulate and agree as follows:
6

7 1. Plaintiff and Guardian Valerie Sanders, for minor individual M.S., no longer
8 wishes to pursue her claims against ZF TRW AH because ZF TRW AH has provided
9 Plaintiff with a declaration confirming no corporate entity within the ZF group of
10 companies designed, manufactured, or marketed the original equipment seat belt assembly
11 or any component of the original equipment seat belt assembly for 2012 Hyundai Elantra
12 vehicles sold in the United States, including the webbing, buckle, retractor, latch plate, or
13 pretensioners within the assembly. ZF TRW AH’s declaration also confirms no corporate
14 entity within the ZF group of companies designed, manufactured, or marketed the original
15 equipment airbag system or any component of the original equipment airbag system for
16 2012 Hyundai Elantra vehicles sold in the United States, including the airbag control unit,
17 front and side crash sensors, or airbag modules within the system
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21 2. ZF TRW AH should be dismissed *without prejudice*.

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3. Plaintiffs and ZF TRW AH shall bear their own attorneys' fees, costs, and expenses in connection with this stipulation and/or the dismissal of ZF TRW AH.

KEMP JONES, LLP

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IT IS SO ORDERED.

U.S. DISTRICT COURT JUDGE

DATED: _____

CASE NO. 2:20-cv-01861